

Comment No.	Comment	Response
Colorado Department of Public Health & Environment (CDPHE) Comments		
	General Comments	
	None	
	Specific Comments	
1	Introduction – It is suggested that this discussion not only address that the site has been compliant with regulatory requirements, but also address the very low results from air monitoring throughout the facility demolition and ER activities. Also, suggest that the last sentence be changed. “Removal of many historical air emissions sources” should be appropriately modified, as we are not aware of any remaining significant historical sources. Include completion of all building demolition as well as accelerated actions, site reconfiguration activities, and all physical activities. Why wouldn’t future air emissions be expected to be less than in the past since all sources have been removed or greatly reduced (such as 903 pad releases)? As such, suggest changing the last sentence to a more positive statement.	The final paragraph of the Introduction will be modified as follows to address the comments: “Monitoring programs and other studies were conducted during both the production era and cleanup phase at RFETS. Historical monitoring data are reviewed in Section 6.4. These data show that contaminant emissions and resulting ambient airborne concentrations during both the weapons production era and cleanup phase were always compliant with all regulatory requirements. In fact, compliance monitoring at the facility fenceline showed maximum airborne radionuclide concentrations of no more than 3 percent of the limiting standard during the entire cleanup phase. With completion of all accelerated actions at RFETS and the attendant removal of all historical air emissions sources except for wind erosion of the minor, remnant contamination in surface soils, future RFETS air emissions will be less than those in the past.”
2	Section 6.4.1 – Suggest the independent close-in building specific radiological air monitoring performed by EPA/CDPHE during demolition activities also be mentioned. Only one elevated detection being identified next to B771 C. Also, the results of the “Edd Kray Pans” placed around Building 776/777 should be included (no elevated detections of concern were identified). In addition, might want to mention the close-in KH/DOE rad monitoring that was performed during building demolition and ER accelerated actions.	Data from the EPA/CDPHE radiological air monitoring and from the “Edd Kray Pans” are not considered particularly relevant to discussions of future air contamination following completion of accelerated actions, since the emissions from the activities monitored would not have resulted in any substantial alteration in the remnant surface soil contamination that represents the only remaining source of airborne radionuclides at the site. For additional discussion of this issue, see Kaiser-Hill Company, LLC, 2002, <i>Building 776/777 Air Modeling Technical Document</i> . Golden, CO. The results of the KH/DOE industrial area radionuclide monitoring are discussed in the final paragraph of Section 6.4.1.
3	It is also recommended that as historical information regarding	Because of the nature of the types of monitoring discussed by the

Comment No.	Comment	Response
	the types of air monitoring that has been performed (though not regulatory driven), there should be mention of other air monitoring, such as personal lapel monitors and other close-in air monitoring, health physics, that was performed during the building demolitions and accelerated actions, such as asbestos monitoring.	commentor, they are not useful to a determination of future air contamination following completion of accelerated actions. As noted previously, the only ongoing source of airborne radionuclides from the site is wind blown dust that may contain small amounts of residual radionuclide contamination. The types of monitoring mentioned here do not provide information regarding the nature and extent of wind blown dust emissions.
Environmental Protection Agency (EPA) Comments		
	General Comments	
1	The data quality objectives (DQOs) associated with the RI/FS are not presented. The accelerated actions were performed based on human health PRGs only, yet data were collected to serve multiple purposes (human health and ecological evaluation). The DQOs for the RI/FS determine whether existing data are adequate to evaluate human health and the environment. Please present RI/FS DQOs relevant to current site conditions and discuss how DQOs are met.	A DQO discussion has been added for the Nature and Extent of Air Contamination.
2		
	Specific Comments	
1	Page 6-4, Section 6.4.2.1. Asbestos is missing from the list of wastes in the landfill. Please add asbestos to the discussion in paragraph 1 and include any relevant discussion of NESHAPs later in the section where other regulations are discussed.	Asbestos will be added to Section 6.4.2.1., first paragraph, third sentence and to Table 6.1. The following sentence will be added to Section 6.4.5: "In addition, asbestos demolition activities were subject to regulation under 40 CFR 61, Subpart M (National Emission Standard for Asbestos; Colorado Regulation No. 8, Part B)."
	Editorial Comments	
	None	
U.S. Fish and Wildlife Service's (USFWS) Comments		
	General Comments	
	None	

Comment No.	Comment	Response
	Specific Comments	
	None	
	Editorial Comments	
	None	